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From: connerd@msu.edu%inter2 [connerd@msu.edu] on behalf of
connerd@msu.edu
Sent: Friday, February 25, 2005 7:54 AM
To: Torres, Francine
Cc: connerd@msu.edu%inter2
Subject: comment: require pasture use in organic dairy

February 17, 2005

Dear Ms. Torres,

As a professional charged with researching and promoting sustainable agriculture at a public university, I strongly endorse the National Organic Standards Board Livestock Committee's recommendation that pasture is an essential part of organic production. This is based on my understanding of research concerning the health, animal welfare, ecological and socio-economic implications of this issue.

The requirement of pasture specifically, and the upholding of strong standards in general, are vital in efforts to give consumers a broader set of options in the marketplace, as well as advancing a system of agriculture that is ecologically, economically and socially sustainable.

The use of pasture is essential in producing dairy products that reflect the attributes that consumers desire in organic foods: healthy and reflecting good animal and ecological stewardship. Various studies have shown that the use of pasture improves the ratio of healthy to unhealthy fats in dairy products, as well as increasing levels of other important nutrients. Furthermore, organic agriculture should strive for the highest level of animal welfare. Access to pasture ensures the cow gets fresh air, exercise and sunshine; grazing outdoors is essential to quality of life for cattle.

The use of pasture is also essential in ensuring that organic dairy farms are sustainable. While one may find examples of pasture-based farms that are poor environmental stewards and confinement farms that take stewardship seriously, pasture-based agriculture is overall a more ecologically sound approach. The extreme concentration of manure in confinement operations poses great ecological risk and is inherently not sustainable. Pasturing, in contrast, turns manure, a waste product in confinement operations, into a soil fertility resource by dispersing it widely over the landscape and allowing natural decomposition to sanitize it. Such cooperation rather than competition with nature is essential to the spirit of organic agriculture.

Support for sustainable agriculture is cited as an important reason why consumers buy organic products. Studies have shown that pasture-based dairy provides a better quality of life and more net profit per animal than confinement operations. More profit per animal means fewer animal units needed to raise a family, and therefore more farms in a community: the link between more numerous, smaller scaled farms and the social and economic health of rural communities has been established in countless studies.

Allowing confinement based dairies to call their products organic will lead to more consolidation, fewer farms and greater ills for rural America.

USDA has a responsibility to uphold strong organic standards, preserving the spirit of organic agriculture and the reasons for its broad and growing popularity with consumers.

The organic label must embody the highest stewardship principles in agriculture: it should inspire producers and consumers to raise the bar of sustainability of our food system, not be diluted to where it loses its integrity and meaning. There is nothing preventing large confinement dairies from labeling their milk as being from cows fed only organic grain, or making similar truthful claims. But to allow confinement-based production systems to call themselves "organic" weakens the word; it would threaten the livelihood of those farmers

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who embody truly sustainable agriculture and decrease the ability of consumers to express their values in the marketplace.

I thank you for the opportunity to comment on this issue and hope you will take our recommendations, as agricultural professionals as well as concerned consumers, into consideration.

Sincerely,

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